

EXHIBIT 19

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 -----X
5 IN RE GOOGLE PLAY STORE
6 ANTITRUST LITIGATION
7 Case No. 3:21-md-02981-JD

8 THIS DOCUMENT RELATES TO:
9 Epic Games Inc. v. Google LLC, et al.,
10 Case No. 3:20-cv-05671-JD

11 In Re Google Play Consumer
12 Antitrust Litigation
13 Case No. 3:20-cv-05671-JD

14 In Re Google Play Developer
15 Antitrust Litigation,
16 Case No: 3:20-cv-05792-JD

17 State of Utah, et al., v.
18 Google LLC, et al.,
19 Case No: 3:21-cv-05227-JD

20 -----X

21 VIDEOTAPE DEPOSITION
22 HAL SINGER, PH.D.
23 Thursday, May 12, 2022
24 9:07 a.m. (EST)

25 Reported by:
Ryan K. Black, RPR, CLR, Notary Public

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Thursday, May 12, 2022

Video Deposition of HAL SINGER, PH.D.,
taken at the Law Offices of Munger, Tolles &
Olson, LLP, 601 Massachusetts Avenue NW
Washington, DC, beginning at 9:07 a.m.,
before Ryan K. Black, a Registered
Professional Reporter, Certified Livenote
Reporter and Notary Public and for the
District of Columbia.

1 A P P E A R A N C E S:

2 CRAVATH, SWAINE & MOORE, LLP

BY: ERIC J. ZEPP, ESQ. - Via Zoom

3 825 8th Ave

New York, New York 10019

4 212.474.1000

ezepp@cravath.com

5 Representing - Epic Games, Inc. In Re:

Epic Games, Inc. V. Google

6 LLC, et al.

7 BARTLIT BECK LLP

8 BY: KARMA M. GIULIANELLI, ESQ.

1801 Wewatta Street

9 Suite 1200

Denver, Colorado 80202

10 303.592.3100

karma.giulianelli@bartlitbeck.com

11 Representing - Consumer Class Plaintiffs

12 HAUSFELD LLP

13 BY: AMY ERNST, ESQ. - Via Zoom

325 Chestnut Street

14 Unit 900

Philadelphia, Pennsylvania 19106

15 215.985.3270

aernst@hausfeld.com

16 Representing - Plaintiff Developers

17 MUNGER, TOLLES & OLSON LLP

18 BY: JUSTIN R. RAPHAEL, ESQ.

560 Mission Street

19 27th Floor

San Francisco, California 94105

20 415.512.4000

justin.rafael@mto.com

21 Representing - Defendants

22 ALSO PRESENT:

23 Emmanuel Pezoa - Legal Videographer

24 Yajing Jiang, Ph.D - Charles River Associates

25 Kevin Caves, Ph.D - Econ One

I N D E X

TESTIMONY OF: HAL SINGER, PH.D	PAGE
By Mr. Raphael.....	6, 391
By Mr. Giulianelli.....	389

E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Exhibit 333	Hal Singer Ph.D's Opening Expert Report.....	28
Exhibit 334	Hal Singer Ph.D's Reply Report...	28
Exhibit 335	an article titled Digital Economics by Avi Goldfarb and Catherine Tucker.....	96
Exhibit 336	a document titled Economics Letters - Using Cost Pass-through To Calibrate Demand, by Miller, Remer and Sheu.....	117
Exhibit 337	an article titled The Antitrust Logit Model For Predicting Unilateral Competitive Effects, by Gregory J. Werden and Luke M. Froeb.....	156
Exhibit 338	a document titled Expert Report of Michelle M. Burtis, Ph.D.....	364

1 THE VIDEOGRAPHER: Good morning. We are
2 on the record at 9:07 a.m. on May 12, 2022. This
3 is the video-recorded deposition of Hal Singer
4 taken in the matter of In re: Google Play Store
5 Antitrust Litigation, filed in the United States
6 District Court, Northern District of California,
7 San Francisco Division, Case No.
8 3:21-MD-02981-JD.

9 My name is Emmanuel Pezoa, from the firm
10 Veritext Legal Solutions. The court reporter is
11 Ryan Black, from the firm Veritext Legal
12 Solutions.

13 Will the court re -- court reporter
14 please swear in the witness?

15 * * *

16 Whereupon --

17 HAL JASON SINGER, PH.D.,
18 called to testify, having been first duly sworn
19 or affirmed, was examined and testified as
20 follows:

21 * * *

22 THE REPORTER: And, Counsel, if you want
23 to state your appearances for the record, that
24 would be great.

25 MR. RAPHAEL: Sure.

1 Justin Raphael, Munger Tolles & Olson,
2 for the defendants.

3 MS. GIULIANELLI: Karma Giulianelli,
4 from Bartlit Beck, for the consumer class.

5 MS. JIANG: Yajing Jiang from Charles
6 River Associates.

7 MR. RAPHAEL: Is there anyone on the
8 line who wants to introduce themselves?

9 MS. ERNST: This is Amy Ernst. I'm here
10 with Hausfeld for the plaintiff developers.

11 THE VIDEOGRAPHER: Thank you. You may
12 proceed.

13 MR. ZEPP: Eric Zepp here, from Cravath
14 Swaine & Moore, on behalf of Epic Games.

15 MR. CAVES: I'm Kevin Caves, with Econ
16 One on behalf of the Commercial developers.

17 EXAMINATION

18 BY MR. RAPHAEL:

19 Q. All right. Dr. Singer, will you just
20 state your name for the record?

21 A. Hal Jason Singer.

22 Q. And, Dr. Singer, you've been deposed
23 many times; is that right?

24 A. Yes.

25 Q. How many times would you say you've been

1 BY MR. RAPHAEL:

2 Q. And developers are the sellers of the
3 apps and the subscriptions and the in-app
4 purchases.

5 MS. GIULIANELLI: Objection.

6 THE WITNESS: I think it's fair to say
7 the developers are the sellers of those -- those
8 three items, yes.

9 BY MR. RAPHAEL:

10 Q. And users are the buyers of those three
11 items?

12 A. Correct.

13 Q. And developers and users are buying a
14 matching service from Google when they're using
15 Google Play.

16 MS. GIULIANELLI: Objection.

17 THE WITNESS: Certainly in the -- what I
18 would call "the Android app distribution market"
19 that -- that Google is contributing valuable
20 matchmaking services in that -- in that initial
21 market -- mark -- in -- in a service for which
22 Google should be compensated.

23 BY MR. RAPHAEL:

24 Q. Now -- and Google's prices for the Play
25 Store, whether they're positive or negative,